

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 1:05CR537
)	
Plaintiff,)	JUDGE JOHN R. ADAMS
)	
v.)	
)	GOVERNMENT'S REQUEST FOR
NOLAN LOVETT,)	<u>RECIPROCAL DISCOVERY</u>
)	
Defendant.)	

Now comes the United States of America, by and through its counsel, Gregory A. White, United States Attorney, and Blas E. Serrano, Assistant United States Attorney, and pursuant to Rule 16(b)(1)(A) and (B), Federal Rules of Criminal Procedure, requests this Court to order the defendant, Nolan Lovett, to permit the government to inspect and copy any books, papers, documents, photographs, tangible objects, and results of physical or mental examinations or scientific tests or experiments which are in the possession, custody, or control of the defendant, or with the exercise of due diligence can be obtained by the

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defendant, and which the defendant intends to introduce as evidence at the forthcoming trial.

Respectfully submitted,

GREGORY A. WHITE
United States Attorney

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BRIEF IN SUPPORT OF MOTION FOR DISCOVERY

Nolan Lovett has requested discovery pursuant to Rule 16(a) (1) (C) and (D) of the Federal Rules of Criminal Procedure. The government has complied with that request and the government now makes a reciprocal request for discovery pursuant to Rule 16(b) (1) (A) and (B). The government submits that the discovery is necessary and relevant to a just determination of this case. The government, therefore, respectfully requests that its motion be granted.

Respectfully submitted,

GREGORY A. WHITE
United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of December, 2005, a copy of the foregoing Government's Request for Reciprocal Discovery was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

s/ Blas E. Serrano
Blas E. Serrano
Assistant U.S. Attorney